

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: Sonya Lynette Moye-Daniels, Debtor

Case No. 25-01221-JAW
CHAPTER 13

**NOTICE OF FILING CHAPTER 13 PLAN AND MOTIONS FOR VALUATION AND
LIEN AVOIDANCE**

The above-named Debtor has filed a *Chapter 13 plan and Motions for Valuation and Lien Avoidance* (the “Plan”) with the Bankruptcy Court in the above referenced case (see attachment).

Any objection to confirmation of the Plan or the motions contained therein shall be filed in writing with the Clerk of Court at ad Cochran U.S. Courthouse 501 E. Court Street Suite 2.300 Jackson, MS 39201 on or before July 14, 2025. Copies of the objection must be served on the Trustee, US Trustee, Debtor, and Attorney for Debtor.

Objections to confirmation will be heard and confirmation determined on July 21, 2025 at 10:00 AM in the Thad Cochran U.S. Courthouse, Bankruptcy Courtroom 4C, 501 East Court Street, Jackson, MS 39201, unless the court orders otherwise. If no objection is timely filed, the Plan may be confirmed without a hearing.

Date: May 19, 2025

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr., Attorney for Debtor

Thomas C. Rollins, Jr., MSB# 103469
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
trollins@therollinsfirm.com
601-500-5533

Debtor **Sonya Lynette Moye-Daniels** Case number _____

Joint Debtor shall pay ____ (☐ monthly, ☐ semi-monthly, ☐ weekly, or ☐ bi-weekly) to the chapter 13 trustee. Unless otherwise ordered by the court, an Order directing payment shall be issued to the joint debtor's employer at the following address:

2.3 Income tax returns/refunds.

Check all that apply

- ☒ Debtor(s) will retain any exempt income tax refunds received during the plan term.
- ☐ Debtor(s) will supply the trustee with a copy of each income tax return filed during the plan term within 14 days of filing the return and will turn over to the trustee all non-exempt income tax refunds received during the plan term.
- ☐ Debtor(s) will treat income refunds as follows:

2.4 Additional payments.

Check one.

- ☒ **None.** If "None" is checked, the rest of § 2.4 need not be completed or reproduced.

Part 3: Treatment of Secured Claims

3.1 Mortgages. (Except mortgages to be crammed down under 11 U.S.C. § 1322(c)(2) and identified in § 3.2 herein.).

Check all that apply.

- ☒ **None.** If "None" is checked, the rest of § 3.1 need not be completed or reproduced.
Insert additional claims as needed.

3.2 Motion for valuation of security, payment of fully secured claims, and modification of undersecured claims. Check one..

- ☐ **None.** If "None" is checked, the rest of § 3.2 need not be completed or reproduced.
The remainder of this paragraph will be effective only if the applicable box in Part 1 of this plan is checked.
- ☒ Pursuant to Bankruptcy Rule 3012, for purposes of 11 U.S.C. § 506(a) and § 1325(a)(5) and for purposes of determination of the amounts to be distributed to holders of secured claims, debtor(s) hereby move(s) the court to value the collateral described below at the lesser of any value set forth below or any value set forth in the proof of claim. Any objection to valuation shall be filed on or before the objection deadline announced in Part 9 of the Notice of Chapter 13 Bankruptcy Case (Official Form 309I).

The portion of any allowed claim that exceeds the amount of the secured claim will be treated as an unsecured claim under Part 5 of this plan. If the amount of a creditor's secured claim is listed below as having no value, the creditor's allowed claim will be treated in its entirety as an unsecured claim under Part 5 of this plan. Unless otherwise ordered by the court, the amount of the creditor's total claim listed on the proof of claim controls over any contrary amounts listed in this paragraph.

Name of creditor	Estimated amount of creditor's total claim #	Collateral	Value of collateral	Amount of secured claim	Interest rate*
Fergus Fcu	\$14,117.00	2007 Wilson Hopper Trailer	\$12,000.00	\$12,000.00	10.00%

Insert additional claims as needed.

#For mobile homes and real estate identified in § 3.2: Special Claim for taxes/insurance:

Name of creditor	Collateral	Amount per month	Beginning
-NONE-			month

* Unless otherwise ordered by the court, the interest rate shall be the current Till rate in this District

Debtor **Sonya Lynette Moye-Daniels** Case number _____

For vehicles identified in § 3.2: The current mileage is _____

3.3 Secured claims excluded from 11 U.S.C. § 506.

Check one.

☐

None. If “None” is checked, the rest of § 3.3 need not be completed or reproduced.

☒

The claims listed below were either:

(1) incurred within 910 days before the petition date and secured by a purchase money security interest in a motor vehicle acquired for the personal use of the debtor(s), or

(2) incurred within 1 year of the petition date and secured by a purchase money security interest in any other thing of value.

These claims will be paid in full under the plan with interest at the rate stated below. Unless otherwise ordered by the court, the claim amount stated on a proof of claim filed before the filing deadline under Bankruptcy Rule 3002(c) controls over any contrary amount listed below. In the absence of a contrary timely filed proof of claim, the amounts stated below are controlling.

Name of Creditor	Collateral	Amount of claim	Interest rate*
Century First	2016 International 4300. 209,111 miles	\$41,420.00	10.00%
Century First	2024 Nissan Sentra 10000 miles	\$21,303.00	10.00%
Fergus Fcu	2018 International LT625	\$24,031.00	10.00%

*Unless otherwise ordered by the court, the interest rate shall be the current Till rate in this District.

Insert additional claims as needed.

3.4 Motion to avoid lien pursuant to 11 U.S.C. § 522.

Check one.

☒

None. If “None” is checked, the rest of § 3.4 need not be completed or reproduced.

3.5 Surrender of collateral.

Check one.

☐

None. If “None” is checked, the rest of § 3.5 need not be completed or reproduced.

☒

The debtor(s) elect to surrender to each creditor listed below the collateral that secures the creditor’s claim. The debtor(s) request that upon confirmation of this plan the stay under 11 U.S.C. § 362(a) be terminated as to the collateral only and that the stay under § 1301 be terminated in all respects. Any allowed unsecured claim resulting from the disposition of the collateral will be treated in Part 5 below.

Name of Creditor	Collateral
Conn's HomePlus	PMSI TV
First Metropolitan	Household Goods
Regional Finance	Household Goods
Republic Finance Llc	Household Goods
World Finance Corp	Household Goods

Insert additional claims as needed.

Part 4: Treatment of Fees and Priority Claims

4.1 General

Trustee’s fees and all allowed priority claims, including domestic support obligations other than those treated in § 4.5, will be paid in full without postpetition interest.

4.2 Trustee’s fees

Trustee’s fees are governed by statute and may change during the course of the case.

4.3 Attorney’s fees.

Debtor **Sonya Lynette Moya-Daniels** Case number _____

☐ No look fee: _____

Total attorney fee charged: \$ _____

Attorney fee previously paid: \$ _____

Attorney fee to be paid in plan per confirmation order: \$ _____

☒ Hourly fee: \$ **Any and all compensation allowed by the Court.** (Subject to approval of Fee Application.)

4.4 Priority claims other than attorney's fees and those treated in § 4.5.

Check one.

☒ **None.** If "None" is checked, the rest of § 4.4 need not be completed or reproduced.

4.5 Domestic support obligations.

☒ **None.** If "None" is checked, the rest of § 4.5 need not be completed or reproduced.

Part 5: Treatment of Nonpriority Unsecured Claims

5.1 Nonpriority unsecured claims not separately classified.

Allowed nonpriority unsecured claims that are not separately classified will be paid, pro rata. If more than one option is checked, the option providing the largest payment will be effective. *Check all that apply.*

☐

The sum of \$

☒

24.00 % of the total amount of these claims, an estimated payment of \$ **20,129.79**

☐

The funds remaining after disbursements have been made to all other creditors provided for in this plan.

If the estate of the debtor(s) were liquidated under chapter 7, nonpriority unsecured claims would be paid approximately **\$6,136.80**. Regardless of the options checked above, payments on allowed nonpriority unsecured claims will be made in at least this amount.

5.2 Other separately classified nonpriority unsecured claims (special claimants). *Check one.*

☒ **None.** If "None" is checked, the rest of § 5.3 need not be completed or reproduced.

Part 6: Executory Contracts and Unexpired Leases

6.1 The executory contracts and unexpired leases listed below are assumed and will be treated as specified. All other executory contracts and unexpired leases are rejected. *Check one.*

☒ **None.** If "None" is checked, the rest of § 6.1 need not be completed or reproduced.

Part 7: Vesting of Property of the Estate

7.1 Property of the estate will vest in the debtor(s) upon entry of discharge.

Part 8: Nonstandard Plan Provisions

8.1 Check "None" or List Nonstandard Plan Provisions

☒ **None.** If "None" is checked, the rest of Part 8 need not be completed or reproduced.

Part 9: Signatures:

9.1 Signatures of Debtor(s) and Debtor(s)' Attorney

Debtor **Sonya Lynette Moye-Daniels** Case number _____

The Debtor(s) and attorney for the Debtor(s), if any, must sign below. If the Debtor(s) do not have an attorney, the Debtor(s) must provide their complete address and telephone number.

X **/s/ Sonya Lynette Moye-Daniels**
Sonya Lynette Moye-Daniels
 Signature of Debtor 1

X _____
 Signature of Debtor 2

Executed on **May 12, 2025**

Executed on _____

1440 Cindy Dr
 Address
Terry MS 39170-0000
 City, State, and Zip Code

 Telephone Number

 Address

 City, State, and Zip Code

 Telephone Number

X **/s/ Thomas C. Rollins, Jr.**
Thomas C. Rollins, Jr. 103469
 Signature of Attorney for Debtor(s)
P.O. Box 13767
Jackson, MS 39236
 Address, City, State, and Zip Code
601-500-5533
 Telephone Number
trollins@therollinsfirm.com
 Email Address

Date **May 12, 2025**

103469 MS
 MS Bar Number

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., attorney for the Debtor, do hereby certify that by filing the attached Notice and Chapter 13 Plan, I have caused the following parties to be served electronically via ECF:

Case Trustee
Office of the US Trustee

I certify that I have this day served a true and correct copy of the attached Notice and Chapter 13 Plan by US Mail¹, postage prepaid, to the following creditor(s) listed in Sections 3.2 and/or 3.4 of the Plan pursuant to Fed. R. Bankr. P. 7004:

Fergus Federal Credit Union
c/o President/CEO
106 E Janeaux St.
Lewistown, MT 59457

I further certify that I have this day served a true and correct copy of the Notice and Chapter 13 Plan by US Mail, postage prepaid, to all other parties listed on the attached master mailing list (matrix).

Date: May 19, 2025

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr., Attorney for Debtor

Thomas C. Rollins, Jr., MSB# 103469
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
trollins@therollinsfirm.com
601-500-5533

¹ If the creditor is an insured depository institution, service has been made by certified mail.

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4 UNITED STATES BANKRUPTCY COURT
5 SOUTHERN DISTRICT OF MISSISSIPPI

6 IN RE:

7 SONYA LYNETTE MOYE DANIELS

CASE NO: 25-01221-JAW

**DECLARATION OF MAILING
CERTIFICATE OF SERVICE**

Chapter: 13

10
11 On 5/19/2025, I did cause a copy of the following documents, described below,
12 Notice and Plan

13
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17
18 to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with
19 sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and
incorporated as if fully set forth herein.

20 I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.
21 com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to
22 Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if
fully set forth herein.

23 Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been
served electronically with the documents described herein per the ECF/PACER system.

24 DATED: 5/19/2025

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

25
26 The Rollins Law Firm
702 West Pine St
Hattiesburg, MS 39401
27 601 500 5533
28 trollins@therollinsfirm.com

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

SONYA LYNETTE MOYE DANIELS

CASE NO: 25-01221-JAW

**CERTIFICATE OF SERVICE
DECLARATION OF MAILING**

Chapter: 13

On 5/19/2025, a copy of the following documents, described below,
Notice and Plan

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 5/19/2025



Miles Wood
BK Attorney Services, LLC
d/b/a certificateofservice.com, for
Thomas C. Rollins, Jr.
The Rollins Law Firm
702 West Pine St
Hattiesburg, MS 39401

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

FIRST CLASS

FERGUS FEDERAL CREDIT UNION
CO PRESIDENTCEO
CO PRESIDENTCEO 106 E JANEUX ST
LEWISTOWN MT 59457

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING
NCRS ADDRESS DOWNLOAD
CASE 25-01221-JAW
SOUTHERN DISTRICT OF MISSISSIPPI
MON MAY 19 9-41-12 PST 2025

CAPITAL ONE AUTO FINANCE A DIVISION C
CAPI
4515 N SANTA FE AVE DEPT APS
OKLAHOMA CITY OK 73118-7901

~~EXCLUDE~~

~~US BANKRUPTCY COURT
THAD COCHRAN US COURTHOUSE
501 E COURT STREET
SUITE 2300
JACKSON MS 39201-5036~~

1ST HERITAGE
101 N MAIN ST
STE 600
GREENVILLE SC 29601-4846

ADT
PO BOX 371490
PITTSBURGH PA 15250-7490

ACIMA
9815 S MONROE ST
SANDY UT 84070-4296

BANK PLUS
1068 HIGHLAND COLONY P
RIDGELAND MS 39157-8807

BITTY ADVANCE
1855 GRIFFIN RD
DANIA FL 33004-2241

CAPITAL ONE AUTO
PO BOX 260848
PLANO TX 75026-0848

CAPITAL ONE AUTO FINANCE
AIS PORTFOLIO SERVICES LLC
4515 N SANTA FE AVE DEPT APS
OKLAHOMA CITY OK 73118-7901

CCBINTEGRA
120 S LASALLE ST
CHICAGO IL 60603-3403

(P)CENTURYFIRST FEDERAL CREDIT UNION
3318 HARDY STREET
HATTIESBURG MS 39401-6962

CONN'S HOMEPLUS
10130 HIGHWAY 151
SAN ANTONIO TX 78251-4771

CONSUMER PORTFOLIO
ATTN BANKRUPTCY
PO BOX 57071
IRVINE CA 92619-7071

(P)US BANK
PO BOX 5229
CINCINNATI OH 45201-5229

FERGUS FCU
1026 E BROAD ST
MONTICELLO MS 39654-7702

FIRST METROPOLITAN
ATTN BANKRUPTCY
6295 SUMMER AVE
STE 102
MEMPHIS TN 38134-5983

NAVY FEDERAL CU
ATTN BANKRUPTCY
PO BOX 3302
MERRIFIELD VA 22119-3302

NETCREDIT
175 W JACKSON BLVD
CHICAGO IL 60604-3043

OUR KIDS CHRISTIAN
40 HOLIDAY RAMBLER LN
BYRAM MS 39272-5580

PROGRESSIVE INSURANCE
6300 WILSON MILLS RD
CLEVELAND OH 44143-2182

REGIONAL MANAGEMENT CORPORATION
979 BATESVILLE ROAD STE B
GREER SC 29651-6819

REGIONAL FINANCE
979 BATESVILLE RD
GREER SC 29651-6819

RENASANT BANK
411 HWY 80 E
CLINTON MS 39056-4719

(P)REPUBLIC FINANCE LLC
282 TOWER RD
PONCHATOULA LA 70454-8318

SLM LOGISTICS
54 JOE BENN RD
BEAUMONT MS 39423-2665

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

SHELTER INSURANCE CO
1817 W BROADWAY
COLUMBIA MO 65218-0001

SYNCHRONY BANK
ATTN BANKRUPTCY
PO BOX 965060
ORLANDO FL 32896-5060

SYNCHRONY BANK
ATTN BANKRUPTCY
POB 965064
ORLANDO FL 32896-5064

~~EXCLUDE~~

~~UNITED STATES TRUSTEE
501 EAST COURT STREET
SUITE C 430
JACKSON MS 39201 5022~~

VIVIAN PORTER
3504 POSEY RD
SMITHDALE MS 39664-8708

WORLD FINANCE CORP
ATTN BANKRUPTCY
PO BOX 6429
GREENVILLE SC 29606-6429

DEBTOR

SONYA LYNETTE MOYE DANIELS
1440 CINDY DR
TERRY MS 39170-8554

~~EXCLUDE~~

~~THOMAS CARL ROLLINS JR
THE ROLLINS LAW FIRM PLLC
PO BOX 13767
JACKSON MS 39236 3767~~

~~EXCLUDE~~

~~TORRI PARKER MARTIN
TORRI PARKER MARTIN CHAPTER 13
BANKRUPT
200 NORTH CONGRESS STREET STE 400
JACKSON MS 39201 1902~~